1 February 2002

Federal Communications Commission
Office of the Secretary
Washington, D.C. 20554

Gentlemen:

I have been an ardent user of the 160 Meter band for nearly 30 years, using SSB and CW; in contests, DXing, and ragchewing; and even integrating 160 meter frequencies into the Ohio Emergency Operations Plan when I was ARRL Section Manager for Ohio in the 1980s. In short, I recognize the unique attractions, challenges, and value of the band for all Amateur uses.

I *strongly support* this proposal to segment the band by wideband and narrow band modes, as specified in RM-10352.

1) **Mode segmentation works.** All bands 80 meters through 2 meters have segments of the band allocated to CW and other narrow-band modes. It works, and minimizes conflicts between operators using the various modes. . If voluntary band plans are not sufficient for the 80, 40, 20, 17, 15, 12, 10, 6, or 2 meter bands, than a voluntary band plan should not be deemed sufficient for 160 meters.

2) **Reliance on voluntary band plans will increase the need for Commission interventions in Amateur disputes.** The subject proposal matches the current ARRL Band Plan for 160 meters. "Differences of opinion" with regard to voluntary band plans could require the Commission to impose "de facto" band segmentation by enforcing the "voluntary" plan. Why not solve the issue now unambiguously, rather than stretching the process out over the next 5 years?

3) **Narrow-band and wide-band mode operations do not mix well**. Both will benefit by segmentation. Operation on 160 meters is often "weak-signal" in nature, with signal levels hovering at the noise level. Strong nearby signals may easily make operation impossible, whether on SSB, CW, or other digital mode. Many CW or digital signals can coexist in a small exclusive bandwidth without interference among them, while one SSB or AM signal will make dozens of CW or other digital communications impossible.

4) **The proposed band segmentation is reasonable.** Sufficient exclusive bandwidth is provided for narrow-band modes (1.800 to 1.843) to promote their continued utilization and growth, and sufficient bandwidth is provided for wideband modes (1.843 – 2.000 MHz) to allow all current and proposed uses.

I urge the Commission to adopt RM-10352 as a positive change for all users of the 160 Meter Amateur band.

Best Regards,

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